

From: [Scott Cerny](#)
To: [Barry Freeman](#); [Stacey Vucko](#)
Cc: ["HOAG, JONATHON D"](#); [Nathaniel Sinn](#); [Kris Slatinsky](#)
Subject: RE: 2-10-2020 Meet and Confer
Date: Friday, February 14, 2020 7:42:17 AM
Attachments: [image002.png](#)
[image004.png](#)
[image008.png](#)
[image010.png](#)
[image012.png](#)
[image014.png](#)
[image7b5ef9.PNG](#)
[image5ee13.PNG](#)
[image65f58c.PNG](#)
[imagef11a2a.PNG](#)
[imageee43f11.PNG](#)
[CourierOne000128.pdf](#)

Ms. Vucko,

Attached is the Joint Defense Agreement entered into between PremierCC, Courier Express One, Inc., PreCC (formerly known as Premier CC., Inc.), Vertek, LLC, Dispatch Express Inc., and Anthony Urso and Bates stamped CourierOne 128-133.

Additionally, following up on the email below, the following represents documents produced by us thus far in this matter:

PremierCC 1-277, produced on September 18, 2019
CourierOne 1-127, produced on December 6, 2019

Additionally, the following records received via subpoena or FOIA request have been produced:

Mack Eye Center 1-17, produced January 7, 2020
St. Alexius 1-511, produced January 9, 2020
Northwest Neurology, produced January 13, 2020
MedPlus Medical Center 1-71, produced January 13, 2020
Advanced OB/Gyne 1-15, produced January 31, 2020
Alexian Bros. Medical Center 1-260, produced February 11, 2020
First Student 1-7 produced February 11, 2020
Township High School 1-64, produced February 11, 2020

Documents re: reasonable accommodations are NOT Premier 182-84. They are Premier 000098, 103-110, 126-28, 184, 195-99; Courier One 000067, 0069-073, 075-76, 078.

If you are not in receipt of any of the above referenced productions, please let me know and I will see that they are provided to you again.

Scott D. Cerny
Paralegal

Ex. 5 to Plaintiff's Motion to Compel

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From: Barry Freeman
Sent: Tuesday, February 11, 2020 6:28 PM
To: 'Stacey Vucko' <svucko@vuckolaw.com>
Cc: 'HOAG, JONATHON D' <JHOAG@HANOVER.COM>; Nathaniel Sinn <NSinn@bdblaw.com>; Kris Slatinsky <kslatinsky@bdblaw.com>; Scott Cerny <SCerny@bdblaw.com>
Subject: RE: 2-10-2020 Meet and Confer

Dear Stacey:

Thank you for speaking with me as well Stacy. As some follow-up:

Scott will confirm whether the Bates-range you cite below constitutes all the Bates-stamped document production by my clients. Obviously there has been significant other production we provided from non-parties, e.g., responses to subpoenas.

FYI, Courier's EPL policy was produced via email on September 18th – Bates –stamped PremierCC 1-89 (even though the accompanying email states it is being produced on behalf of Courier Express One).

We will have an email search in Microsoft Outlook performed for “m.marski@courierexpress1.com” to locate emails to or from Ms. Marski, and we presume Jon Hoag will have a similar search done for “m.marski@premierccdirect.com” – but I’ll let Jon speak for himself. The only emails I contemplate being withheld would be those including attorney-client communications, which will be identified by date, recipients (including ccs) and subject line (unless that is also privileged).

For Verizon records, we will have Mr. Urso and Ms. Ruffolo go online and pull whatever records are available by download from Verizon, and those records will be produced.

I don't want to speak for Jon Hoag, but we agree to the additional interrogatory (in excess of the limit) to Courier. No leave of Court is necessary.

Respectfully,

Barry

Barry Y. Freeman

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From: Stacey Vucko [<mailto:svucko@vuckolaw.com>]
Sent: Monday, February 10, 2020 5:58 PM
To: Barry Freeman <BFreeman@bdblawn.com>
Cc: 'HOAG, JONATHON D' <JHOAG@HANOVER.COM>
Subject: 2-10-2020 Meet and Confer

Dear Barry,

Thank you for speaking with me this afternoon regarding Plaintiff's request to Defendants to supplement their document production and interrogatories. Per our call, I have received document production from Defendants bearing Bates labels Premier CC000001-277 and Courier000001-127. Please confirm that there are no additional documents which were previously produced by Defendants which we do not yet have in our possession.

In addition, I wanted to memorialize our agreement that Defendants will be producing the entirety of Plaintiff's email accounts (for both her work account with Premier CC, Inc. and Courier Express One, Inc.) as well as the Verizon records we previously agreed on for Anthony and Gianna. I understand also that you have received our second set of interrogatories and that Defendants will not object to

one additional interrogatory to Courier and two interrogatories to Premier CC, Inc. Therefore, Plaintiff will not seek leave of court to issue these requests and will await Defendants' responses.

Sincerely,
Stacey



Stacey Vucko

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